

EXHIBIT 2

Illustration of Procedural History of
“Cain Actions”

**Original Complaint Purporting to Allege Only
Product Liability Without Certificate of Good Faith**



IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

JOCELYN KAE NORRIS,)	
)	
Plaintiff,)	
)	
v.)	
)	
AMERIDOSE, LLC, MEDICAL SALES)	Case No. _____
MANAGEMENT, INC., MEDICAL SALES)	JURY DEMAND
MANAGEMENT SW, INC., GDC)	
PROPERTIES MANAGEMENT, LLC, ARL)	
BIO PHARMA, INC. D/B/A ANALYTICAL)	
RESEARCH LABORATORIES, BARRY J.)	
CADDEN, GREGORY CONIGLIARO, LISA)	
CONIGLIARO CADDEN, DOUGLAS)	
CONIGLIARO, CARLA CONIGLIARO,)	
GLENN A. CHIN, and SPECIALTY)	
SURGERY CENTER, PLLC d/b/a)	
SPECIALTY SURGERY CENTER,)	
)	
Defendants.)	
)	

COMPLAINT

The Plaintiff, Jocelyn Kae Norris, for her cause of action against the Defendants respectfully states to the Court as follows:

COUNT V
PRODUCT LIABILITY CLAIMS
(Against Specialty Surgery)

**First Amended Complaint Explicitly Alleging Health Care Liability
Without Certificate of Good Faith**



**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOCELYN KAE NORRIS	:	CIVIL ACTION NO. 1:13-cv-12682-FDS
Plaintiff,	:	MDL No. 2419
v.	:	Master Docket No. 1:13-md-2419-FDS
UNIFIRST CORPORATION, D/B/A UNICLEAN CLEANROOM SERVICES, ^{and} SPECIALTY SURGERY CENTER, PLLC D/B/A SPECIALTY SURGERY CENTER,	:	Honorable F. Dennis Saylor
Defendants.	:	<u>DEMAND FOR JURY TRIAL</u>

**SHORT FORM COMPLAINT
AGAINST UNAFFILIATED DEFENDANTS**

- COUNT III: NEGLIGENCE AND GROSS NEGLIGENCE (Against Clinic Related Defendant)
- COUNT VIII: FAILURE TO WARN (Against Clinic Related Defendant)

**Second Amended Complaint Explicitly Alleging Health Care
Liability With Certificate of Good Faith**



**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOCELYN KAE NORRIS	:	CIVIL ACTION NO. 1:13-cv-12682-FDS
	:	
Plaintiff,	:	MDL No. 2419
	:	Master Docket No. 1:13-md-2419-FDS
v.	:	Honorable F. Dennis Saylor
UNIFIRST CORPORATION, D/B/A	:	
UNICLEAN CLEANROOM	:	
SERVICES, ^{and} SPECIALTY	:	<u>DEMAND FOR JURY TRIAL</u>
SURGERY CENTER, PLLC D/B/A	:	
SPECIALTY SURGERY CENTER,	:	
	:	
Defendants.	:	

**AMENDED SHORT FORM COMPLAINT
AGAINST UNAFFILIATED DEFENDANTS**

- COUNT III: NEGLIGENCE AMD GROSS NEGLIGENCE (Against Clinic Related Defendant)
- COUNT VIII: FAILURE TO WARN (Against Clinic Related Defendant)